

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: **VIANCA SHEREE WRIGHT,**

Chapter 13

Debtor(s).

Case No. 19-26481-GMH

NOTICE AND REQUEST TO AMEND UNCONFIRMED CHAPTER 13 PLAN

Susan M. Williams has filed papers with the court requesting amendment of the unconfirmed Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for a hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court
517 E. Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Attorney Paul Strouse
d/b/a Strouse Law Offices
413 N. 2nd Street, Suite 150
Milwaukee, WI 53203

If you or your attorney do not take these steps, the court may decide that you do not oppose the

Address: 413 N. 2nd Street., Suite 150
Milwaukee, WI 53203
Telephone: (414) 390-0820
Fax: (414) 220-5115
strouselawoffices@gmail.com

request and may enter an order modifying the Plan

REQUEST TO AMEND UNCONFIRMED CHAPTER 13 PLAN

1. This request to amend an unconfirmed Chapter 13 Plan **SUPERSEDES ALL PRIOR REQUESTS TO AMEND THE PLAN AND INCLUDES ALL PROPOSED AMENDMENTS. TERMS NOT FULLY STATED HERE OR IN THE ORIGINAL PLAN ARE NOT PART OF THE PLAN.**
2. Service. A certificate of service must be filed with the amendment. Designate one of the following:
 - A. X A copy of this proposed amendment has been served on the trustee, United States trustee and all creditors, or
 - B. A motion requesting limited service is being filed simultaneously with the Court.
3. The Chapter 13 Plan filed with the Court is amended as follows:
 - A. **The debtor is amending her plan in order to move the secured claim belonging to the City of Milwaukee-Office of the City Treasurer from Section 3.2 of her plan to Section 3.3 of her plan and ask that it be treated as a secured claim excluded from 11 U.S.C 506.**
 - B. **The Debtor is amending her plan in order to suspend her plan payments for the months of February, 2020 and March, 2020. The reason for this amendment is due to the fact that at the time of filing this case the debtor was working as a security guard at Universal Protection Service, LLC and operating her commercial cleaning business, Aloysius Janitorial Services ("Aloysius"). Shortly after this case was filed Aloysius was awarded part of a 3 million contract to clean Milwaukee Public Schools. At the time debtor was awarded this contract, she quit her job as a security guard in order devote her full efforts to Aloysius. Then in October, 2019, Milwaukee Public Schools improperly terminated her contract, which caused her monthly income to dwindle down to preactically nothing. This wrongful termination is the subject of a lawsuit in Circuit Court for Milwaukee County, Milwaukee County Case Number 2020CV000398 Aloysius Janitorial Services vs. Milwaukee Public Schools. The debtor is confident that more contracts are on the way and she should be able to resume her plan payments in April, 2020.**
 - C. **The debtor is amending her plan so that when she resumes her plan payments in April 2020 the plan payment will be \$705.00 by direct payments to the trustee, for the remaining applicable period.**

All remaining terms of the original Chapter 13 Plan are unaffected. In the event of a conflict between the terms of the original Plan and the terms of this amendment, the terms of this

amendment control.

WHEREFORE, each Debtor requests that the Court approve this proposed amendment to the original Chapter 13 Plan.

CERTIFICATION

The Debtor's attorney must sign this certification. A Debtor represented by an attorney may sign this certification. If the Debtor does not have an attorney, the Debtor must sign this certification.

The provisions in this Chapter 13 plan are identical to those contained in the official local form other than the changes listed in part 3.

I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted February 27th, 2020.

Strouse Law
Attorneys for Debtor

By: /s/Paul A. Strouse
Attorney Paul A. Strouse
Bar No. 1017891

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